

December 17, 2012

VIA FAX AND OVERNIGHT DELIVERY

Ms. Elizabeth J. Basil, P.E., Director  
Engineering Services Division  
Bureau of Air Quality  
South Carolina Department of Health and Environmental Control  
2600 Bull Street  
Columbia, South Carolina 29201-1708

Re: Resolute FP US Inc. (formerly AbiBow US Inc.)  
PSD Construction Permit 2440-0005-DC  
Request for Extension  
Kraft Pulping Process

Dear Ms. Basil:

Resolute FP US Inc. (Resolute) requests an extension of PSD construction permit 2440-0005-DC issued for the kraft pulping process in accordance with permit condition 2.B.2. The construction permit was issued on November 18, 2011.

#### BACKGROUND

Construction permit 2440-0005-DC was issued for modifications to the kraft pulping process to modify the method of operation and make physical modifications to parts of the Kraft Pulping process in order to incrementally increase the potential production of Kraft pulp by increasing the efficiency of the conversion of wood chips into usable Kraft pulp fiber. Specifically the proposed modifications will allow a shift in the lignin removed from wood chips by the Kraft digester process to the downstream oxygen de-lignification and bleaching processes which can potentially remove lignin more selectively.

The specific modifications included:

- Continuous Digester (increase Kappa number target, decreased lignin removal)
  - Change in method of operation
  - New wash/cooking circulation pump Increase Kappa number target
  - New wash/cooking circulation heater
  - Additional extraction Screens
- Oxygen Delignification (*3rd oxygen delignification stage*, increased lignin removal)
  - Change in method of operation
  - *New oxygen mixer*
  - *New booster pump*
  - *New oxygen reactor*
  - Increased BSW shower water.
- Kraft Bleach Plant (increased lignin removal)
  - Change in method of operation
- Kraft ClO<sub>2</sub> Generator (increased bleaching chemical)

- New filtrate separation system
- No.1 Evaporator Set (improved energy efficiency)
  - New heat exchanger
  - New transfer pump
  - Pump upgrades
- No.3 Evaporator Set (improved energy efficiency)
  - New surface condenser
  - New gas cooler
  - New ejector condensers
  - New hot well
  - Pump replacements

The initial modifications approved under the construction permit were completed on July 23, 2012. However, the 3<sup>rd</sup> oxygen delignification stage (new oxygen mixer, new booster pump, new oxygen reactor) was not installed during the initial at that time due to economic constraints.

#### CHANGES IN APPLICABLE REGULATIONS

There are no changes to the applicable regulations for this project. Following the initial start-up all required compliance demonstrations were completed. These compliance demonstrations will be repeated within 180 days of the completion of the 3<sup>rd</sup> oxygen delignification stage.

#### CURRENT PERMIT EXPIRATION

Construction permit DC becomes invalid if construction is not commenced within 18 months after receipt of such approval, if construction is discontinued for a period of 18 months or more, or if construction is not completed within a reasonable time (Condition 2.B.1). Therefore, approval for installation of the 3<sup>rd</sup> oxygen delignification stage expires on January 23, 2014.

#### REQUEST

Resolute requests the Bureau extend the time allowed for installation of the 3<sup>rd</sup> oxygen delignification stage (new oxygen mixer, new booster pump, new oxygen reactor) authorized by PSD construction permit 2440-0005-DC. Resolute requests an extension of PSD construction permit DC until **November 18, 2014** to allow sufficient time for economic improvement to allow these additional modifications.

If you have any questions, require further clarification, or need additional information regarding this request, please do not hesitate to contact me.

Sincerely,

Dale L. Herendeen

Ms. Elizabeth J. Basil, P.E., Director  
December 17, 2012  
Page 3

Environmental Manager  
Resolute FP US Inc.

cc: Katharine Buckner, SCDHEC, Columbia, SC